

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FILED  
RICHARD W. NAGEL  
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U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
EAST. DIV. COLUMBUS

DRFP L.L.C., d/b/a Skye Ventures,

Plaintiff,

v.

República Bolivariana de Venezuela, *et al.*,

Defendants.

Case No. 2:04-cv-0793

Judge Sargus

Magistrate Judge Kemp

**DEFENDANTS' MOTION TO COMPEL CRABBE, BROWN & JAMES TO PRODUCE  
ALLEGEDLY PRIVILEGED GRUPPO TRIAD DOCUMENTS IN ITS POSSESSION  
AND TO COMPEL GRUPPO TRIAD AND LARA PAVANELLI, THE PRESIDENT OF  
GRUPPO TRIAD, TO PRODUCE OTHER ALLEGEDLY PRIVILEGED GRUPPO  
TRIAD DOCUMENTS, AS WELL AS THE MEMORANDUM IN SUPPORT,  
DECLARATION, AND EXHIBITS FILED UNDER SEAL ON FEBRUARY 3, 2015.**

**FILED UNDER SEAL PURSUANT  
TO STIPULATION AND PROTECTIVE ORDER  
[DOC. 327]**

**CONFIDENTIAL, ATTORNEY EYES ONLY AND RESTRICTED  
ACCESS ACCORDING TO COURT ORDER**

**THIS ENVELOPE, WHICH CONTAINS DOCUMENTS  
FILED IN THIS CASE IS NOT TO BE OPENED, NOR ARE THE CONTENTS  
THEREOF TO BE DISPLACED OR REVEALED EXCEPT BY ORDER OF THE  
COURT OR CONSENT OF THE PARTIES**

Respectfully submitted,

REPÚBLICA BOLIVARIANA DE  
VENEZUELA AND VENEZUELAN  
MINISTRY OF FINANCE

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Dated: February 4, 2015